



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Edwin C. Bakowski, P.E.  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

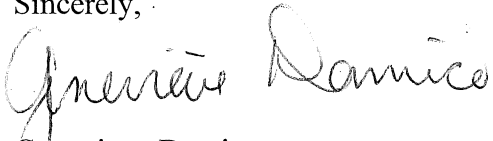
The U.S. Environmental Protection Agency has reviewed the draft Renewal Clean Air Act Permit Program (CAAPP) permit (Application No. 01050068) prepared by the Illinois Environmental Protection Agency (IEPA) for Ameren Energy Generating Company, Gibson City Power Plant, located at 545 North Jordan Drive, Gibson City, Illinois. EPA has the following comments on the draft CAAPP permit:

1. The Statement of Basis (Project Summary) does not adequately explain the relationship between the draft CAAPP permit and previous CAAPP operating permits issued by IEPA to the facility. From our discussions with IEPA, we understand that the draft CAAPP permit is a significant modification to CAAPP Permit No. 01050068, issued March 19, 2009. However, a discussion of such a relationship is missing from both the draft CAAPP permit and the Project Summary. At a minimum, the Project Summary needs to clearly explain:
  - a. the requirements of the original permit that are being changed and why they are being changed;
  - b. whether or not any newly applicable requirements (since the last permit was issued) are being addressed in the significant modification; and
  - c. the current compliance status of the source with respect to all applicable requirements.
2. Neither the draft CAAPP permit nor the Project Summary addresses the applicability of CAAPP permitting requirements to Greenhouse Gas (GHG) emissions from the source. Condition 5.1.1. states that the source is a major source of Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO), Particulate Matter (PM), and Sulfur Dioxide (SO<sub>2</sub>) emissions. Please clarify whether or not the source is also major for GHGs.

3. The draft CAAPP permit provides conflicting information on how compliance with certain numerical emission limits will be demonstrated. According to Condition 7.1.6(a), compliance with the hourly emission limits in Condition 7.1.6(a) shall be based on average emissions determined by emissions testing (3-run average) or emissions monitoring (24-hour average). Condition 7.1.6(c) explains that compliance with the annual limits in Condition 7.1.6(b) will be based on monthly emissions data, which will presumably be based on the same data used to verify compliance with Condition 7.1.6(a). However, the testing requirements in Condition 7.1.7 appear to only apply to NOx, Oxygen and opacity. Test methods and procedures have not been specified for CO, SO<sub>2</sub>, Volatile Organic Material (VOM) and PM, which makes it difficult to determine how the source will demonstrate compliance with CO, SO<sub>2</sub>, VOM and PM emission limits as required by Condition 7.1.6(a). Moreover, Conditions 7.1.6(d) and 7.1.12(e) appear to suggest that the source can use other options (besides stack testing) for demonstrating compliance with the numerical emission limits. Please clarify how compliance with the numerical emission limits in Conditions 7.1.6(a) and 7.1.6(b) will be demonstrated.
4. It is not clear from the draft CAAPP permit and the Project Summary why 40 C.F.R. Part 64, Compliance Assurance Monitoring (CAM), does not apply to SO<sub>2</sub> emissions from the combustion turbines. According to Condition 7.1.4(e)(i), the turbines are not subject to CAM requirements for NOx and SO<sub>2</sub> because a) the affected turbines are subject to a New Source Performance Standard proposed after November 15, 1990, pursuant to 40 C.F.R. § 64.2(b)(1)(i); b) the affected turbines are subject to Acid Rain Program requirements, pursuant to 40 C.F.R. § 64.2(b)(1)(iii); and c) the affected turbines are subject to an emission limitation or standard for which the draft CAAPP permit specifies a continuous compliance determination method, pursuant to 40 C.F.R. § 64.2(b)(1)(vi). EPA concurs that, pursuant to 40 C.F.R. § 64.2(b)(1), certain post-1990 federal limitations and standards are excluded from consideration for CAM applicability. However, the exemption of these emission limitations and standards from CAM is not an exemption for entire units. A non-exempt standard (e.g., an emission limit from a State Implementation Plan (SIP) or New Source Review (NSR) permit) that applies to a unit does not become exempt from CAM just because the unit becomes subject to a post-November 15, 1990, federal standard that regulates the same pollutant(s), regardless of the relative stringency of those applicable requirements. The emission limits contained in Conditions 7.1.6(a) and 7.1.6(b) appear to be derived from SIP or NSR permit requirements. Also, although the draft CAAPP permit requires a Continuous Emissions Monitoring System (CEMS) for NOx emissions (which satisfies criterion (C) of Condition 7.1.4(e)(i)), the draft CAAPP permit does not require a CEMS for SO<sub>2</sub>. Thus, it is unclear how criterion (C) of Condition 7.1.4(e)(i) applies to SO<sub>2</sub>. Please clarify in the permit record why CAM requirements do not apply to SO<sub>2</sub> emissions from the combustion turbines.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision. We look forward to working with you to address all of our comments. If you have any questions, please feel free to contact me at (312) 353-4761 or David Ogulei, of my staff, at (312) 353-0987.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name.

Genevieve Damico  
Chief  
Air Permits Section